

I urge the Commission to reject any changes to Part 15 that aim to reduce roadblocks to fielding more pervasive and higher power BPL. Further, I urge that Part 15 requirements on BPL interference be strengthened before the technology is further deployed.

Power distribution plant was never intended for this application. Power lines, considered at HF and VHF frequencies, are unbalanced, difficult to model, and typically in poor repair. The fact that they are capable of carrier current modulation at multiplexed high data rates is an engineering marvel, but that does not mean that to use them for this purpose is a good idea.

In fact it is a very bad idea. The inevitable resulting interference with existing and potential licensed users of the HF and VHF spectrum will reduce the viability, reliability, and usability of these licensed systems, which the Commission has promised to protect.

If a foreign actor were to raise the radio noise floor across vast reaches of the United States, in effect jamming existing services, the U.S. Government would likely consider the act to be a hostile form of electronic warfare. The Commission must be extremely cautious in this matter of national security and economic interest.

Beyond these, I have a personal interest: I own and operate a licensed station in the Amateur Radio Service. Extension of BPL will mean that eventually I will have poorly-engineered, minimally-maintained, broad-spectrum noise sources within 50 feet of my HF antennas in all directions. This will sharply reduce the value of the considerable investment I have made in my station.

Again, I urge the Commission to reject any changes to Part 15 that aim to reduce roadblocks to fielding more pervasive and higher power BPL.